

From: [Hankins, Martha \(ECY\)](#)
To: [Baldi, Josh \(ECY\)](#); [Duff, Robert \(ECY\)](#); [Davies, Holly \(ECY\)](#); [Howard, Sandy \(ECY\)](#); [Laurie, Tom \(ECY\)](#); [Gildersleeve, Melissa \(ECY\)](#); [Kraege, Carol P. \(ECY\)](#); [Niemi, Cheryl \(ECY\)](#); [Norton, Dale \(ECY\)](#); [Pendowski, Jim \(ECY\)](#); [Piazza, Millie \(ECY\)](#); [Preston, Seth \(ECY\)](#); [Susewind, Kelly \(ECY\)](#); [Terwilleger, Karen \(ECY\)](#); Kissinger.Lon@epamail.epa.gov; [McBride, David \(DOH\)](#)
Cc: [Asher, Chance \(ECY\)](#); [Bradley, Dave \(ECY\)](#); [Feldcamp, Michael \(ECY\)](#); [Kmet, Peter \(ECY\)](#); [McCormack, Craig \(ECY\)](#); [Dorrah, Adrienne \(ECY\)](#)
Subject: Fish Consumption Rate TSD Internal Review - comments due Aug 10
Date: Wednesday, August 01, 2012 4:29:42 PM

[attachment "Supplemental-Info-to-Support-FCR-TSD.pdf" deleted by Lon Kissinger/R10/USEPA/US]

[attachment "FCR_Report-2_WORKING DRAFT_08-01-12.docx" deleted by Lon Kissinger/R10/USEPA/US]

To: Internal reviewers

Josh Baldi, Rob Duff, Holly Davies, Sandy Howard, Tom Laurie, Melissa Gildersleeve, Carol Kraege, Cheryl Niemi, Dale Norton, Jim Pendowski, Millie Piazza, Seth Preston, Kelly Susewind, Karen Terwilleger, Lon Kissinger (EPA), David McBride (DOH)

CC: Chance Asher, Dave Bradley, Michael Feldcamp, Pete Kmet, Craig McCormack

From: Martha Hankins

Re: Internal Review of the revised Fish Consumption Rate Technical Support Document, Version. 2.0 (internal review draft). Comments are due Friday, Aug 10, 2012.

Date: August 1, 2012

The attached Internal Review Draft of the Fish Consumption Rate Technical Support Document is provided for your review. Thank you in advance. As you know, this issue is receiving considerable attention. Your review will help in getting us document ready for public review. (A public comment period is being planned, tentatively for late August to October; a set of Technical Meetings are being planned for late September through October)

FCR Technical Support Document

This draft is for internal review only: please do not distribute. Comments are due Friday, Aug 10; your prompt review is appreciated. Also included in this review are Dave McBride (DOH) and Lon Kissinger (EPA) in recognition of their expertise and appreciation for their technical assistance.

How has the FCR Technical Support Document changed?

The first version of the TSD was distributed for comments in Sept 2011. The comment period closed January 2012. In response to comments several areas have changed or have been expanded. These include:

1. The preface is new.
2. This draft has additional and more detailed information about fish consumption estimates for both regional and general population fish consumers.

3. A further analysis by Ecology of regional fish consumption surveys provided more detail on the fish and shellfish species consumed and the areas from which those species are harvested
4. Information on the technical quality review and external peer review process for the regional specific fish dietary surveys (CRITFC, Tulalip and Squaxin, Suquamish, and Asian and Pacific Islander surveys) was added. Appendices providing documentation were added.
5. This draft does not make any recommendations on a default rate. It does not identify a range for establishing a default range. This draft is a compilation of information: the choice of fish consumption rates is recognized as a policy decision based on and supported by scientific and technical information. This draft does not address the policy choices.

What additional analyses has Ecology done in response to comments?

Also attached (as supplemental info) is a set of five technical issue papers. They address specific questions identified during the September 2011 to January 2012 public comment period for the draft TSD. (These technical issue papers are included here for reference purposes. They were produced specifically to better enable Ecology to respond to public comments. Your review and comments are welcome.)

Supplemental Information: Technical Issue Papers

- Estimating Annual Fish Consumption Rates Using Data from Short-Term Surveys
- Recreational Fish Consumption Rates
- Salmon Life History and Contaminant Body Burdens
- Health Benefits and Risks from Consuming Fish and Shellfish
- Chemical Contaminants in Dietary Protein Sources

Will the fish consumption rate information be used in the Sediment Management Standards?

No. Ecology initially intended to include a default fish consumption rate in the Sediment Management Standards in order to better address bioaccumulation and protect human health when cleaning up sites with contaminated sediments. Recently, (July 2012) the agency decided instead to proceed with the SMS rule update without including a numeric default fish consumption rate; cleanup decisions would instead consider a reasonable maximum exposure based on a tribal exposure scenario.

To accommodate this change, sections discussing the Sediment Management Standards and Water Quality Standards have been removed from the TSD: the document now focuses only on the questions of “how much fish do people in Washington eat, what data is available, and where are the fish obtained?”

Instructions to reviewers

I recognize there is a lot of information here. Because of the size of the document and the large amount of information, a focused review strategy is suggested: Please review the preface, introductory material, and table of contents. I suggest you focus on the sections

most relevant to your areas of expertise and interest. (Of course, any and all comments are welcome.) Please note: Chapters 4, 5, and 6 have undergone considerable changes; Chapter 7(Recommendations) has been deleted.

TSD: Please use Track Changes and Comments. (Alternatively, general comments can be provided in email.)

Issue papers: Please send comments in email or in a Word file.

Comments are due Friday, Aug 10

Please provide comments to me (Martha Hankins) on or before Friday, August 10, 2012. If you have specific technical questions please direct them to Craig McCormack (craig.mccormack@ecy.wa.gov or 407-7193).

Many thanks,
Martha